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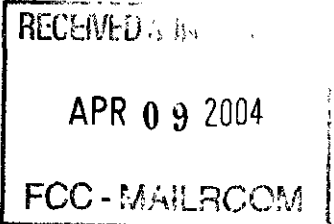
Comments on <u>**RM-10868**</u>

Submitted to: Federal Communications Commission
445 12th Street SW
Washington, DC 20554

In reviewing RM-10868, the Radio Amateur Foundation offers some interesting ideas, but it is not as reasonable as the proposal submitted under RM-10867. I fully support the consolidation of the Advanced Class license with the Amateur Extra Class, granting limited HF privileges to Technician Class if a new entry class is not adopted as proposed elsewhere. I do, however, disagree with this petitions position related to the amateur radio question pools.

1. Consolidation of the Advanced Class license with the Amateur Extra is appropriate because (1) both licenses reflect similar levels of skill and (2) it will simply and make more efficient the administration of the entire licensing structure. Absolutely no license class should lose privileges. The slight gain in privileges by the Advanced Class is warranted, again, because the levels of technology associated with the classes are similar and the trade-off to simplify and administratively streamline the class structure is more than worth the move. The merging of the Advanced Class license without further testing absolutely should happen.

2. I strongly encourage a 5 wpm Morse code requirement for the General Class license. Code can be the most reliable mode of communications, and should be supported. Moreover, if there are sub-bands allocated for CW, a minimal code requirement (5 wpm) is appropriate Otherwise, why have a code band for the General Class?

3. Finally, the proposal to re-write and remove the question pool from the public domain is both unnecessary and counterproductive. The current pool is more than adequate, and the idea of making the pool a "secret" serves no purpose. Keeping the pool in the public domain not only provides a pool of test questions, the questions themselves serve as a teaching tool that is far more effective than general theory presentations. The question pool should remain in the public domain.

As a minimum the Commission should consolidate the Advanced Class and Amateur Extra without further testing, keep minimal code requirements associated with the General Class, and keep, not remove, the question pool in the public domain.

Respectfully submitted by:

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